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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Aaron Feld,

Plaintiff,

v.

Navient Solutions, LLC and Pioneer
Credit Recovery, Inc.,

Defendants.

Case No.: 2:20-cv-01156-GMN-NJK
Dept No.:

**Unopposed Motion and Order for
an extension of time for Plaintiff to
respond to Defendants' Motion to
stay case**

1 Aaron Feld (“Plaintiff”), with notice to and approval of, Navient
2 Solutions, LLC and Pioneer Credit Recovery, Inc. (“Defendants”), by counsel,
3 hereby submits this Unopposed Motion and Order for an extension of time for
4 Plaintiff to respond to Defendants' Motion to stay case, filed on March 1,
5 2020. This is the first request for an extension of this deadline.

6 The extension is sought because the motion is complex as it involves
7 ongoing litigation in the United States Supreme Court on issues that are also
8 being briefed in other circuit and district courts. As such, counsel is requesting
9 more time to prepare an appropriate response.

10 At this time in the litigation, discovery is essentially closed and the next
11 court deadline is on April 12, 2021 for the filing of dispositive motions. Thus,
12 there is no risk of prejudice to any party.

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1 In good faith and not for the purposes of delay, Plaintiff, with notice to
2 Defendants and approval to file unopposed, pleads the Court to Order that
3 Plaintiff's response to the pending Motion to stay case shall be due on or
4 before **March 29, 2021**.

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6 Dated: March 12, 2021.

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8 **FREEDOM LAW FIRM, LLC**

9 /s/ Gerardo Avalos

10 Gerardo Avalos, Esq.
11 8985 South Eastern Ave., Suite 350
12 Las Vegas, NV 89123
13 *Counsel for Plaintiff*

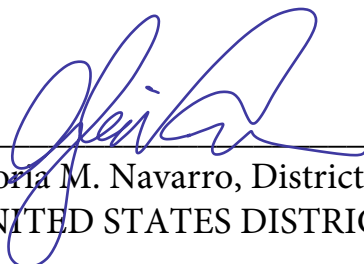
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15 **HOLLEY DRIGGS**

16 Approved to file unopposed

17 Michael Ayers, Esq.
18 800 S. Meadows Parkway, Suite 800
19 Reno, Nevada 89521
20 *Counsel for Defendants*

21
22 **IT IS SO ORDERED.**

23 Dated this 12 day of March, 2021.

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25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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